

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT COURT OF DELAWARE**

SARA S. ECHEVARRIA,

Plaintiff,

V.

U-HAUL INTERNATIONAL, INC.,
ROGER MAYFIELD, and
NATIONWIDE GENERAL INSURANCE
COMPANY,

Defendants.

Case No.: 05-284 (GMS)

Removed from Superior Court,
New Castle County, Delaware
C.A. No.: 05C-03-188 WCC

**RULE 26(a)(1) DISCLOSURES OF
DEFENDANT U-HAUL INTERNATIONAL, INC.**

Defendant, U-Haul International, Inc. ("UHI"), by and through its attorneys, Blank Rome LLP and Quarles & Brady LLP, pursuant to Fed. R. Civ. P. 26(a)(1), states as follows:

A. The name and, if known, the address and telephone number of each individual likely to have discoverable information that the disclosing party may use to support its claims or defenses, unless solely for impeachment, identifying the subjects of the information.

RESPONSE:

1. George R Olds
U-Haul International, Inc.
2727 North Central Avenue
Phoenix, Arizona

Mr. Olds will testify with regard to the corporate structure of U-Haul International, Inc., and parent, subsidiary and/or sister corporations.

A representative of U-Haul Co. of Florida, Inc. will testify with regard to the rental of the truck and trailer at issue.

UHI also expects these representatives to testify in accordance the Answer and Affirmative Defenses to the Complaint. They may also authenticate documents produced by UHI in this matter.

Investigation continues.

2. Certain employee(s) of Nationwide Insurance Company who have first-hand knowledge of the plaintiff's Complaint, Nationwide's investigation of the same, its insured, Roger Mayfield, and who may authenticate documents produced by Nationwide.
3. Roger Mayfield, current address and phone number unknown. Investigation continues.
4. Such other persons as identified in the parties' discovery answers and in documents produced herein by plaintiff and defendants and subpoenaed non-parties on the subject matter set forth in said answers and documents. This includes those persons who may authenticate such documents.

Investigation continues.

B. A copy of, or a description by category and location of, all documents, data compilations, and tangible things that are in the possession, custody, or control of the party and that the disclosing party may use to support its claims or defenses, unless solely for impeachment.

RESPONSE:

UHI will produce a copy of the rental agreement; relevant repair records; the relevant insurance declaration page, including the insurance provided on the truck provided to Mayfield by virtue of the laws of Delaware; photographs taken of the truck and trailer subsequent to the accident, and a copy of a transcript of an interview of Roger Mayfield.

C. A computation of any category of damages claimed by the disclosing party, making available for inspection and copying as under Rule 34 the documents or other evidentiary material, not privileged or protected from disclosure, on which such computation is based, including materials bearing on the nature and extent of injuries suffered.

RESPONSE:

N/A. Investigation continues.

D. For inspection and copying as under Rule 34 any insurance agreement under which any person carrying on an insurance business may be liable to satisfy part or all of a judgment which may be entered in the action or to indemnify or reimburse for payments made to satisfy the judgment.

RESPONSE:

UHI is self-insured in the amount of \$5,000,000 per occurrence. Additionally, Roger Mayfield may be entitled to insurance related to his rental of the truck, up to the motorist minimum financial responsibility limits under Delaware law.

Dated: January 6, 2006


BLANK/ROME LLP

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CERTIFICATE OF SERVICE

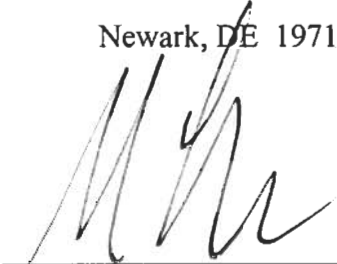
I, Steven L. Caponi, hereby certify that on this 6th day of January, 2006, copies of Rule 26(A)(1) Disclosures Of Defendant U-Haul International, Inc was served electronically and in the manners indicated upon:

BY HAND

Richard A. DiLiberto, Jr.
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BY FIRST CLASS MAIL

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